

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|---------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, | : | CASE NO. 1:19CR705 |
| | : | |
| Plaintiff, | : | |
| | : | JUDGE SOLOMON OLIVER, JR. |
| vs. | : | |
| | : | |
| AARON GAGE, | : | |
| | : | <u>DEFENDANT'S MOTION FOR</u> |
| | : | <u>VIRTUAL HOME INSPECTION</u> |
| Defendant. | : | <u>AND SECOND REQUEST FOR</u> |
| | : | <u>EMERGENCY HEARING</u> |
| | : | |

Defendant Aaron Gage, through counsel respectfully moves this Honorable Court for an Order requiring U.S. Pretrial and Probation Office to conduct a virtual home inspection on Mr. Gage's proposed residence. On April 24, 2020, Mr. Gage filed a Motion for Bond and Emergency Intervention by the Court. (Dkt. 16). On April 27, 2020, Mr. Gage filed a Supplement to his motion. (Dkt. 17).

The proposed address has been evaluated for suitability by the undersigned and will be provided to Pretrial Services upon request. Mr. Gage makes this request so the Court may consider the home's suitability in comparison to considering COVID 19's infestation at NEOCC.

NEOCC has been declared a public safety hazard to those held and working in the facility and to the surrounding community. Mr. Gage is at reduced risk if released pursuant to 19 U.S.C. § 3142(i) according to his Pleading and Expert Report. Mr. Gage is 3 to 4 times more likely to face

serious and irreversible medical consequences. Mr. Gage is at risk of death. (Report at 14). Given these circumstances Mr. Gage asks for an immediate hearing.

Mr. Gage has asked to temporarily release him on home confinement and states again that his Motion presents an immediate danger and he therefore requests, again, that this Court schedule a hearing as requested *ex post haste* so it may address the emergency that has developed at NEOCC.

Respectfully submitted,

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